



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

BWB:KLK  
F. #2015R00200

*271 Cadman Plaza East  
Brooklyn, New York 11201*

July 5, 2015

By FedEx and ECF

Zachary Margulis-Ohnuma, Esq.  
260 Madison Avenue, Suite 1800  
New York, NY 10016

Re: United States v. Adamou Djibo  
Criminal Docket No. 15-088 (SJ)

Dear Mr. Margulis-Ohnuma:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, enclosed please find supplemental discovery in the above-referenced matter. This discovery supplements the government's disclosures of April 7, 2015, April 28, 2015 and June 1, 2015. The government also requests reciprocal discovery.

Statements, Documents and Videos

Statements of the defendant are reflected in emails sent to and/or from the defendant while incarcerated from May 4, 2015 to June 22, 2015, Bates-numbered AD0453.

The following Rule 16 discovery is also enclosed:

- Records obtained from Chase Bank, Washington Mutual Bank and Bank of America relating to the defendant, Bates-numbered AD0454-1667;
- Records obtained from the cellular telephone belonging to Stanley Walden; Bates-numbered AD1668-1717;
- Copies of documents and items seized from the defendant; Bates-numbered AD1718-1780;
- Copies of travel records relating to Stanley Walden; Bates-numbered AD1781-1783;
- A Chemical Analysis Report prepared by the Drug Enforcement Administration, Bates-numbered AD1784;
- A Laboratory Report prepared by the New York City Police Department Controlled Substance Analysis Section, Bates-numbered AD1785;
- Records obtained from the Best Western Jamaica Inn, Bates-numbered AD1786-1801; and
- Photographic line-up identifications, Bates-numbered AD1802-1804.

Surveillance video obtained from Bank of America is also enclosed on a CD, Bates-numbered AD1807. An Affidavit from a Bank of America custodian of records relating to the surveillance video is enclosed, Bates-numbered AD1805-1806.

Expert Witness

Further, this is to provide notice that the government anticipates calling an expert at trial to testify about narcotics trafficking practices, including (i) the type and quantity of the narcotics seized from the defendant's co-conspirators; (ii) the street value of the narcotics seized; (iii) that the quantities seized are consistent with distribution; (iv) characteristics of the drug trade from Africa, including the status of Ghana and Togo as source countries; (v) common methods of concealment used by narcotics traffickers; (vi) communication techniques used by narcotics traffickers, including the use of coded communications and the use of multiple telephones to avoid detection by law enforcement; and (vii) the organizational structure and hierarchy of narcotics trafficking organizations, including the use of organizers, distributors, recruiters and couriers. The identity and curriculum vitae of the expert will be provided in the government's disclosures pursuant to Title 18, United States Code, Section 3500.

Very truly yours,

KELLY T. CURRIE  
Acting United States Attorney

By: /s/ Karen Koniuszy  
Karen L. Koniuszy  
Assistant U.S. Attorney  
(718) 254-6072

Enclosures

cc: Clerk of the Court (SJ) (by ECF) (without enclosures)